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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 04 2022

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11
12 UNITED STATES OF AMERICA,

13
14 Plaintiff,

15 v.

16
17 DANIEL JAMES ANDERSON and
18 CONNOR DUANE GOODMAN,

19 Defendants.
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28

4:22-CR-6001-SMJ

INDICTMENT

Vio: 18 U.S.C. § 371

Conspiracy to Make or Possess
an Unregistered Destructive
Device
(Count 1)

26 U.S.C. §§ 5841, 5845(a)(8),
5861(d), 5871
Possession of an Unregistered
Destructive Device
(Count 2)

26 U.S.C. § 5872, 28 U.S.C.
§ 2461, 49 U.S.C. § 80303
Forfeiture Allegations

1 The Grand Jury charges:

2
3 COUNT 1

4 GENERAL ALLEGATIONS

5 1. At all times relevant to this Indictment, the Defendants, DANIEL
6 JAMES ANDERSON (“ANDERSON”) and CONNOR DUANE GOODMAN
7 (“GOODMAN”), were members of a self-described anti-government/anti-authority
8 group called “the Verified Bois.”
9

10
11 2. At all times relevant to this Indictment, ANDERSON resided in
12 Kennewick, Washington, within the Eastern District of Washington.
13

14 3. At all times relevant to this Indictment, GOODMAN, resided in
15 Auburn, Washington, within the Western District of Washington.
16

17 4. At all times relevant to this Indictment, neither ANDERSON nor
18 GOODMAN had any firearms or explosive devices registered in their names in the
19 National Firearms Registration and Transfer Record.
20

21 5. The Verified Bois regularly conducted training events, during which
22 members of the group practiced small unit tactics, raids, firearms handling and
23 manipulation, and survival skills.
24

25 6. At least one of these training events occurred within the Eastern
26 District of Washington.
27
28

1 7. Beginning on a date unknown, but by on or about June 1, 2021, and
2 continuing until on or about December 16, 2021, in the Eastern District of
3 Washington and elsewhere, ANDERSON and GOODMAN did willfully conspire
4 and agree with each other and others, both known and unknown to the Grand Jury,
5 to knowingly make and possess a destructive device, as that term is defined in 26
6 U.S.C. § 5845(a)(8), which was not registered to either of them in the National
7 Firearms Registration and Transfer Record, all in violation of 26 U.S.C. §§ 5822,
8 5841, 5845(a)(8), 5861(c), (d), and (f).
9

12 THE UNLAWFUL OBJECT
13 AND MANNER AND MEANS OF THE CONSPIRACY
14

15 8. It was the overall object and plan of the conspiracy to construct a
16 destructive device for possible future use in attacking law enforcement officers.
17

18 9. Members of the Verified Bois, including ANDERSON and
19 GOODMAN, frequently discussed their willingness to use force against members
20 of groups whom they perceived to engage in over-aggressive law enforcement
21 action.
22

23 OVERT ACTS
24

25 10. In furtherance of the conspiracy and to accomplish its objectives,
26 ANDERSON, GOODMAN, and other co-conspirators committed the following
27 overt acts, among others, some of which occurred within the Eastern District of
28 Washington:

1 a. In May 2021, during a Verified Bois meeting, GOODMAN
2 discussed loading a vehicle with Tannerite, a binary explosive that is commercially
3 available for target-shooting purposes, which would turn the vehicle into a vehicle-
4 born improvised explosive device.
5

6 b. On or about June 1, 2021, ANDERSON used an online social
7 media platform to request that members of the Verified Bois provide him with
8 flash powder or fireworks containing magnesium and phosphorus so that he could
9 construct an improvised explosive device.
10

11 c. Between on or about June 1, 2021 and on or about June 26,
12 2021, in response to ANDERSON's request, GOODMAN obtained fireworks from
13 a tribal reservation located in the Western District of Washington and arranged to
14 transport the fireworks to ANDERSON in the Eastern District of Washington. The
15 fireworks obtained by GOODMAN consisted of a package containing five (5)
16 Thundercracker KK0033 fireworks, UN0336 1.4G. A label affixed to each
17 firework indicated the presence of explosives. The packaging indicated that the
18 fireworks were manufactured in China, a foreign nation.
19

20 d. On or about June 26, 2021, in the ^{Eastern} ~~Western~~ District of ^{pmc 1/4/2022}
21 Washington, GOODMAN delivered the fireworks to a confidential source ("CS"), ^{for 11/4/2022}
22 who then delivered the fireworks to ANDERSON at the behest of GOODMAN.
23
24 The exchange of the fireworks between ANDERSON and the CS occurred at
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1 ANDERSON's residence in the Eastern District of Washington on or about June
2 29, 2021.

3
4 e. During this exchange, ANDERSON informed the CS that his
5 intent was to use the contents of the fireworks to construct improvised explosive
6 devices. Specifically, ANDERSON told the CS that he would be constructing
7 improvised explosive devices that would include ball bearings as shrapnel and the
8 explosive material from the fireworks.
9

10
11 f. During this same exchange when speaking to the CS,
12 ANDERSON also described hand-held explosive devices that could be used at
13 protests or thrown over the front line of law enforcement officers and explode
14 behind them.
15

16
17 g. In July 2021, ANDERSON informed the CS that he was having
18 difficulty with the construction of one of his explosive device designs, which he
19 was constructing. ANDERSON told the CS that the ball bearings did not properly
20 adhere to the sides of the device.
21

22
23 h. In August 2021, ANDERSON told the CS that he had recently
24 tested three types of explosive devices that he had constructed. ANDERSON told
25 the CS that two of the three devices performed as designed.
26

27 i. In September 2021, on an online social media platform,
28 ANDERSON described his devices as "distraction devices" before stating the

1 following: “[the devices] aren’t training tools. I wouldn’t be anywhere near this
2 thing. It’s going to throw shrapnel like a MF.” ANDERSON further stated that he
3 had produced multiple versions of a device.
4

5 j. In October 2021, ANDERSON, at his residence in the Eastern
6 District of Washington, showed the CS an example of an improvised explosive
7 device that he had designed, and explained how he had constructed the device.
8 The device consisted of a glass mason jar, filled with paper wadding, with shotgun
9 pellets affixed to the wadding, an explosive charge wrapped in black tape, a fuse,
10 and a reinforced cap.
11
12

13 k. In December 2021, GOODMAN informed the CS that the
14 fireworks that GOODMAN had provided to the CS to deliver to ANDERSON
15 were for the purpose of ANDERSON developing an improvised explosive device.
16
17

18 l. In December 2021, GOODMAN agreed to sell the CS similar
19 fireworks, so the CS could construct improvised explosive devices similar to those
20 designed by ANDERSON.
21

22 m. In December 2021, ANDERSON and GOODMAN attended a
23 multi-day meeting at which the CS was also present. This meeting took place in the
24 Eastern District of Washington. During this meeting, GOODMAN sold the CS
25 twelve (12) mortar-style fireworks, so that the CS could construct improvised
26 explosive devices.
27
28

PC
1/4/2022
PMC
1/4/2022

n. During this same multi-day meeting in the Eastern District of Washington, ANDERSON informed the CS how to manipulate the fireworks to extract the compounds necessary to construct improvised explosive devices. All in violation of 18 U.S.C. § 371.

COUNT 2

On or about December 16, 2021, in the Eastern District of Washington, the Defendant, DANIEL JAMES ANDERSON, did knowingly possess a firearm that was not registered to him in the National Firearms Registration and Transfer Record, to wit: an improvised explosive device consisting of a small glass jar containing wadding, shrapnel, an explosive charge, and a fuse, in violation of 26 U.S.C. §§ 5841, 5845(a)(8), 5861(d), 5871.

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

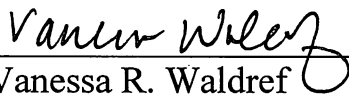
The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

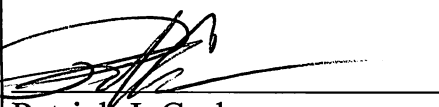
Pursuant to 26 U.S.C. § 5872, 28 U.S.C. § 2461, and 49 U.S.C. § 80303, upon conviction of an offense in violation of 26 U.S.C. §§ 5845, 5861(d), 5871, as set forth in this Indictment, the Defendant, DANIEL JAMES ANDERSON, shall forfeit to the United States of America any property involved or used in the commission of the offense, including, but not limited to, the following:

1 an improvised explosive device consisting of a small glass jar containing wadding,
2 shrapnel, an explosive charge, and a fuse.

3
4 DATED this 4 day of January 2022.

5
6
7 A TRUE BILL
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13 Vanessa R. Waldref
14 United States Attorney

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16 Patrick J. Cashman
17 Assistant United States Attorney
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